

THE LAW OFFICES OF
FREDERICK K. BREWINGTON
Attorneys and Counselors at Law

556 Peninsula Blvd., Hempstead, New York 11550
Phone: 516-489-6959 • Fax: 516-489-6958 www.brewingtonlaw.com

Frederick K. Brewington
Cathryn Harris-Marchesi
Tricia S. Lindsay
Julissa M. Proaño

Oscar Holt III
Of Counsel

March 25, 2019

VIA ELECTRONIC CASE FILING

Honorable Steven I. Locke
United States Eastern District Court
Court Room 820
100 Federal Plaza
Central Islip, New York 11722

Re: *Abreu v. Verizon New York, Inc.*
Docket No.: CV-15-58 (SIL)

Dear Judge Locke:

As you are aware, we are the attorneys representing the Plaintiff in the above referenced matter. This letter follows the request by the Jury for a read-back of the testimony of witnesses Stephen Moore and Arthur Polosino. As to these witnesses the parties have responded affirmatively to the Court's inquiry as to whether the parties would agree to the Jury being provided copies of the transcribed testimony of the respective witness. We write to respectfully confirm our agreement as to these two witnesses and to request that if the Court does provide the transcripts that the following additional instruction be provided to the Jury:

Ladies and Gentlemen, since we are providing you with the transcripts of Mr. Moore and Mr. Polosino in response to your request of a read back of each of their entire testimonies, there are some instructions I must give you on your use and evaluation these transcripts.

While you are the judges of the facts, I remind you to take care to consider all the evidence without unduly emphasizing any portion. With that caution, please be informed that we will be supplying you with three (3) copies of each of the transcripts containing the full testimonies of each of these witnesses. (Source; *U.S. v. Escotto*, 121 F.3d 81 (2nd Cir. 1997))

We thank The Court in advance for its kind consideration.

Respectfully submitted,
Frederick K. Brewington /s/
FREDERICK K. BREWINGTON

cc: Paul Galligan, Esq. (Via ECF)
Howard Wexler, Esq. (Via ECF)
Meredith-Anne Berger, Esq. (Via ECF)

FKB:lvo